

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FLEXPORT, INC.,

Plaintiff,

v.

WESTERN GLOBAL AIRLINES, LLC,

Defendant.

Case No. 1:19-cv-06383 (PGG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Affidavit of James K. Neff with the exhibit annexed thereto, and Affidavit of Sigmund S. Wissner-Gross, Esq., and all of the prior pleadings and proceedings in this action, Defendant Western Global Airlines, LLC through its undersigned counsel, will move this Court, before the Honorable Paul G. Gardephe, United States District Judge, on such date as the Court will determine, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order, pursuant to the Federal Arbitration Act, compelling Plaintiff Flexport, Inc. to arbitrate all the claims pled in the Amended Complaint, Dkt. No. 12, and to stay this action during the pendency of the arbitration proceedings before the American Arbitration Association.

Dated: November 25, 2019
New York, New York

Respectfully submitted,

WESTERN GLOBAL AIRLINES, LLC

By its attorneys

By: /s/ Sigmund S. Wissner-Gross
Sigmund S. Wissner-Gross

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